

1 Daniel Velton (SBN 267890)
VJ Chetty (SBN 271778)
2 VELTON ZEGELMAN P.C.
525 W. Remington Drive, Suite 106
3 Sunnyvale, CA 94087
Telephone: (408) 505-7892
4 Fax: (408) 228-1930
dvelton@vzfirm.com
5 vchetty@vzfirm.com

6 Attorneys for Plaintiff
SVETLANA BLACKBURN

7
8 MICHAEL DELIKAT
(NY STATE BAR NO. MD1165)

Appearing pro hac vice

9 mdelikat@orrick.com

RENEE B. PHILLIPS

10 (NY STATE BAR NO. RP4456)

Appearing pro hac vice

11 rphillips@orrick.com

ORRICK, HERRINGTON &

12 SUTCLIFFE LLP

51 West 52nd Street

13 New York, New York 10019-6142

Telephone: +1-212-506-5000

14 Facsimile: + 1-212-506-5151

15 KENNETH HERZINGER
(STATE BAR NO. 209688)

16 kherzinger@orrick.com

ERIN M. CONNELL

17 (STATE BAR NO. 223355)

econnell@orrick.com

18 ORRICK, HERRINGTON &

19 SUTCLIFFE LLP

405 Howard Street

San Francisco, California 94105

20 Telephone: + 1-415-773-5700

Facsimile: + 1-415-773-5759

21 Attorneys for Defendant

22 ORACLE AMERICA, INC.

23
24 **IN THE UNITED STATES DISTRICT COURT**
25 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
26
27
28

SVETLANA BLACKBURN, an individual,

Plaintiff,

v.

ORACLE AMERICA, INC., a Delaware
corporation,

Defendant.

Case No.: 3:16-cv-02925-EMC

**JOINT STIPULATION & [PROPOSED]
ORDER TO CONTINUE DATE OF
INITIAL CASE MANAGEMENT
CONFERENCE**

JOINT STIPULATION

This Stipulation is made by and between Plaintiff Svetlana Blackburn ("Plaintiff") and Defendant Oracle America, Inc. ("Defendant"), through their respective counsel of record, with reference to the following facts:

1. On June 1, 2016, Plaintiff filed her Complaint (Dkt. No. 1).

2. On August 1, 2016, the Court issued a Case Management Conference Order In Reassigned Case in this action (Dkt. No. 17).

3. The Court's Order set the Parties' Initial Case Management Conference for September 8, 2016 and the filing date for the Parties' Case Management Statement for September 1, 2016.

4. The parties have met and conferred, and agree to private mediation, to be completed by October 31, 2016.

NOW THEREFORE, the parties stipulate and jointly request that the Court continue the date for the Case Management Conference in this matter to a date convenient to the Court after October 31, 2016 (the date by which the parties have agreed to mediate), and that all associated dates (including the deadline to file a Joint Case Management Statement) be based on the new date for the Case Management Conference.

IT IS SO STIPULATED.

DATED: August 31, 2016

VELTON ZEGELMAN P.C.

By: /s/ VJ Chetty

VJ Chetty

Attorney for Plaintiff

SVETLANA BLACKBURN

DATED: August 31, 2016

ORRICK, HERRINGTON & SUTCLIFFE

By: /s/Michael Delikat

Michael Delikat

Attorney for Defendant

ORACLE AMERICA, INC.